

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Caption:

William O'Bryant

448 Walton Avenue, #512

Hummelstown, PA 17036

*Full name(s) of Plaintiff(s)*

**COMPLAINT  
FOR EMPLOYMENT  
DISCRIMINATION**

v.

CIVIL ACTION

NO. \_\_\_\_\_

Robert Half International

-AND-

Dormakaba USA

*Full name(s) of Defendant(s)*

This action is brought for discrimination in employment pursuant to (check only those that apply):

- X Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).  
*NOTE: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.*
- X Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621-634.  
*NOTE: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission, and you must have been at least 40 years old at the time you believe that you were discriminated against.*
- X Americans with Disability Act of 1990, as codified, 42 U.S.C. §§ 12112-12117.  
*NOTE: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.*
- X Pennsylvania Human Relations Act, as codified, 43 Pa. Cons. Stat. §§ 951-963 (race, color, family status, religious creed, ancestry, handicap or disability, age, sex, national origin, the use of a guide or support animal because of blindness, deafness or physical handicap of the user or because the user is a handler or trainer of support or guide animals).

**NOTE:** In order to bring suit in federal district court under the Pennsylvania Human Relations Act, you must first file a complaint with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations, and then you must wait one year prior to filing a lawsuit.

**I. Parties in this complaint:**

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name: William O'Bryant  
Street Address: 448 Walton Avenue, #512  
County, City: Dauphin County, Hummelstown  
State & Zip: PA 17036  
Telephone Number: 267-227-0043

- B. List all defendants' names and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the caption on the first page. Attach additional sheets of paper as necessary.

Defendant Name: Robert Half International - See attached sheets.  
Street Address: 1735 Market Street, 25th Floor  
County, City: Philadelphia, PA  
State & Zip: 19103  
Telephone Number: 215-568-4580

- C. The address at which I sought employment or was employed by the defendant(s) is:

Employer: Dormakaba USA  
Street Address: 100 Dorma Drive  
County, City: Lancaster County - Reamstown  
State & Zip: PA 17567  
Telephone Number: 717-336-3881

**II. Statement of the Claim**

- A. The discriminatory conduct of which I complain in this action includes (*check only those that apply to your case*):

☐ Failure to hire me  
☒ Termination of my employment  
☐ Failure to promote me

☒ Failure to reasonably accommodate my disability

☒ Failure to reasonably accommodate my religion

☐ Failure to stop harassment

☐ Unequal terms and conditions of my employment

☒ Retaliation

☒ Other (specify): Age Discrimination

**NOTE:** Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.

B. It is my best recollection that the alleged discriminatory acts occurred or began on or about: (month) October, (day) 22nd, (year) 2021.

C. I believe that the defendant(s) (check one):

☐ is still committing these acts against me.

☒ is **not** still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check only those that apply and state the basis for discrimination, for example, what is your religion, if religious discrimination is alleged):

☐ race \_\_\_\_\_

☐ color \_\_\_\_\_

☒ religion \_\_\_\_\_

☐ gender/sex \_\_\_\_\_

☐ national origin \_\_\_\_\_

☒ age My date of birth is 10/11/67 (Give your date of birth only if you are asserting a claim of age discrimination)

E. The facts of my case are as follow (attach additional sheets of paper as necessary):

See attached sheets.

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**NOTE:** *As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, the Pennsylvania Human Relations Commission, or the Philadelphia Commission on Human Relations.*

**III. Exhaustion of Administrative Remedies:**

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on: 11/25/21 & 4/5/22 (Date).

B. The Equal Employment Opportunity Commission (*check one*):

       has not issued a Notice of Right to Sue Letter. Both on  
X issued a Notice of Right to Sue Letter, which I received on 9/28/22 (Date).

**NOTE:** *Attach to this complaint a copy of the Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.*

C. *Only plaintiffs alleging age discrimination must answer this question.*

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct (*check one*):

X 60 days or more have passed.  
       fewer than 60 days have passed.

D. It is my best recollection that I filed a charge with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations regarding the defendant's alleged discriminatory conduct on: 11/25/21 & 4/5/22 (Date).

E. Since filing my charge of discrimination with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations regarding the defendant's alleged discriminatory conduct (*check one*):

X One year or more has passed.  
X Less than one year has passed.



**IV. Relief**

**WHEREFORE**, Plaintiff prays that the Court grant such relief as may be appropriate, including injunctive orders, damages, and costs as well as (*check only those that apply*):

- ☐ Direct the defendant to hire the plaintiff.
- ☐ Direct the defendant to re-employ the plaintiff.
- ☐ Direct the defendant to promote the plaintiff.
- ☐ Direct the defendant to reasonably accommodate the plaintiff's disabilities.
- ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
- ☐ Direct the defendant to (*specify*): \_\_\_\_\_
- ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- ☐ Other (*specify*): \_\_\_\_\_

**I declare under penalty of perjury that the foregoing is true and correct.**

Signed this 15 day of December, 2022

Signature of Plaintiff



Address

448 Walton Avenue, #512

Hummelstown, PA

17036

Telephone number

267-227-0043

Fax number (*if you have one*)

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

Civil Division

William O'Bryant  
448 Walton Avenue, #512  
Hummelstown, PA 17036

Plaintiff(s)

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-v-

See attached.

Defendant(s)

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

Case No. \_\_\_\_\_

*(to be filled in by the Clerk's Office)*Jury Trial: (check one) ☒ Yes ☐ No

## COMPLAINT FOR A CIVIL CASE

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

|                    |                              |
|--------------------|------------------------------|
| Name               | William O'Bryant             |
| Street Address     | 448 Walton Avenue, #512      |
| City and County    | Hummelstown - Dauphin County |
| State and Zip Code | PA 17036                     |
| Telephone Number   | 267-227-0043                 |
| E-mail Address     | compucare@comcast.net        |

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

## Defendant No. 1

Name Robert Half International

Job or Title *(if known)* \_\_\_\_\_

Street Address 1735 Market Street, 25th Floor

City and County Philadelphia

State and Zip Code PA 19103

Telephone Number 215-568-4580

E-mail Address *(if known)* \_\_\_\_\_

## Defendant No. 2

Name Dormakaba USA

Job or Title *(if known)* \_\_\_\_\_

Street Address 100 Dorma Drive

City and County Reamstown - Lancaster County

State and Zip Code PA 17567

Telephone Number 717-336-3881

E-mail Address *(if known)* \_\_\_\_\_

## Defendant No. 3

Name \_\_\_\_\_

Job or Title *(if known)* \_\_\_\_\_

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address *(if known)* \_\_\_\_\_

## Defendant No. 4

Name \_\_\_\_\_

Job or Title *(if known)* \_\_\_\_\_

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address *(if known)* \_\_\_\_\_

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Age discrimination, religious discrimination, disability discrimination, wrongful termination. i.e. Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act, and the Age Discrimination in Employment Act.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the State of *(name)* \_\_\_\_\_.

## b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

## 2. The Defendant(s)

## a. If the defendant is an individual

The defendant, *(name)* \_\_\_\_\_, is a citizen of the State of *(name)* \_\_\_\_\_. Or is a citizen of *(foreign nation)* \_\_\_\_\_.



b. If the defendant is a corporation

The defendant, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_, and has its principal place of business in *(name)* \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Wrongful termination. Plaintiff was terminated on October 29th, 2021, just days after (1) requesting disability accommodations for his back problems and had previously reported that he had degenerative disc disease, and (2) for informing both Robert Half International and Dormakaba management that he intended to request the religious exemption in lieu of receiving the Covid vaccination which Dormakaba was attempting to force upon all employees/contractors

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See attached sheets.

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The Plaintiff hereby requests relief in the amount of \$300,000 for: (1) Unlawful discrimination on the basis of disability pursuant to the Americans with Disabilities Act of 1990, as amended, 42 U.S.C. § 12112, (2) retaliation by termination of employment for requesting Constitutionally-protected religious exemptions, (3) Unlawful discrimination and retaliation by termination of employment on the basis of non-job-related handicap or disability in violation of Section 5(a) of the Pennsylvania Human Relations Act, and (4) Violation of the Age Discrimination Act of 1975.

Plaintiff respectfully requests that this Honorable Court enter judgment in favor of Plaintiff and against Defendant and award damages, including back pay, front pay, compensatory and punitive damages, costs and interest, and enter an Order enjoining Defendant(s) from engaging in discriminatory practices in violation of the Pennsylvania Human Relations Act, as amended, and award Plaintiff any other available legal or equitable relief as the Court deems appropriate.

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/15/2022

Signature of Plaintiff



Printed Name of Plaintiff

William O'Bryant

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
Civil Division

William O'Bryant, 448 Walton Avenue, #512,  
Hummelstown, PA 17036

Plaintiff,

vs.

Robert Half International, 1735 Market Street,  
25<sup>th</sup> Floor, Philadelphia, PA 19103

-AND-

Dormakaba USA, 100 Dorma Way,  
Reamstown, PA 17567

Defendant(s)

Case No.:

STATEMENT OF CLAIM

**III. STATEMENT OF CLAIM**

1. I was hired by Robert Half International for their client, Dormakaba, located in Reamstown, PA.
2. The role was as a standard Desktop Support Technician.
3. I was told by Morgan Komatick, Robert Half's recruiting agent who contacted me about the role, that the position would be ongoing and permanent, but that I would not be solicited for direct hire by their client.
4. On the first day, Mitchell Lawrence asked me to help him move items out of a security cage located on the production floor. I informed him that I had back problems due to previous accidents in which I was rear-ended, as well as degenerative disc disease, and so

1 I could not be moving heavy items. The items turned out to be used monitors which he  
2 wanted me to clean first, and minor boxes having little weight, such as toner cartridges  
3 for their copying machines, so I was able to do as he requested without issue. Later that  
4 morning during a conference call between myself, Mitchell Lawrence, John Carter and  
5 Michael Reeves, Mitchell informed them that I had a bad back during a minor break in  
6 the conversation but his comment went ignored. It was my first day after all, and  
7 everything was going fine. Though I was not happy being used to do their monkey work  
8 none of their own employees wanted to do by using Clorox wipes to clean approximately  
9 25 old monitors caked with dust and dirt from the production floor and clearing out some  
10 of the mess they made of their own security cage, since it was my first day, I did the work  
11 without complaint. But still, I should point out that I was hired as a Desktop Support  
12 Technician because I have over 20 years' experience, not a cleaning lady or a laborer, so  
13 inwardly I didn't appreciate being taken advantage of like that. The only reason I  
14 continued in the role after that is because Mitch Lawrence promised that the computer  
15 work would begin the next day, which it did.

- 16 5. Three days after beginning the job, Mitch Lawrence, who by the way was not my  
17 supervisor nor did I state that he was, informed me that he had been previously promoted  
18 to Project Manager and would be working from home beginning that upcoming Monday.  
19 I thought nothing of it at first, but then the next morning when I got up to get ready to go  
20 in, I realized that meant I would be working alone, handling all the desktop support needs  
21 for the entire location, by myself, and that changed things. It meant I would be under my  
22 own supervision, dealing with all the technical issues that came my way, including  
23 employee requests and walk-ups, and that changed the role from Desktop Support  
24 Technician to Desktop Support Manager. After all, I had recently done this same exact  
25 role for another business, I was there for a year and a half as their Desktop Support



1 Manager, and that role was no different than the one with Dormakaba, and that previous  
2 role is likely why they hired me in the first place. In fact, that business was about three  
3 times smaller than Dormakaba's location, and yet I was being paid more. It was then that  
4 I realized the position was deliberately misrepresented, most likely to get away with  
5 offering a lower rate of pay. During lunch time I had then called Morgan Komatick from  
6 my car and informed her, and told her that if I'm going to be managing the entire building  
7 by myself then I should be appropriately compensated. I specifically also remember  
8 saying, "After all, more responsibility means more money. That's the way it works," and  
9 she agreed.

10 6. On the fourth day, not long after I arrived for work the next morning, I called and spoke  
11 to Morgan and Abigail's boss, if I recall correctly, Christopher Devine. I told him the  
12 situation and that I would be in charge of the entire location, after which -and let me  
13 stress this point- HE OFFERED an extra \$2.00 per hour, and I accepted. I did not  
14 "demand," anything, as they are claiming. As an avid professional, I informed him of the  
15 situation, I requested a higher pay rate, he approved, and he offered the additional  
16 compensation. After that, everything was fine and I continued on in the role.

17 7. On the morning of Friday, October 22<sup>nd</sup>, 2021, Derek Wissler came into the IT Office and  
18 informed me about a company meeting he was going to hold outside in the parking lot,  
19 and oddly, invited me to attend. I say "oddly" because I wasn't an employee, but I told  
20 him I'd be there. When I went outside, all of the employees in the entire company were in  
21 attendance. Derek Wissler then informed everyone that, and I quote, "since you are all  
22 federal contractors, you will be required to be vaccinated." The moment he said that I  
23 didn't agree with it, (1) because he said nothing about accommodating any religious  
24 exemptions, and (2) because I immediately felt that he was likely pushing a false  
25 narrative from their management in effort to force the vaccines upon everyone within

1 their employ, because to state that “all Dormakaba employees are federal  
2 subcontractors,” especially when most, if not all of those employees actually work  
3 directly for Dormakaba itself as regular employees and not in fact directly for the federal  
4 government, nor are required to physically visit any federal government facilities, was an  
5 obvious effort to that purpose and was specifically meant to secure their continued  
6 financial gain without disruption. Some time after that meeting took place, I also called  
7 and spoke to Morgan Komatick and told her about it, and stated I was going to request  
8 the religious exemption.

- 9 8. Knowing in advance that I had the right to request a religious accommodation and not  
10 wanting to lose my job, that weekend I also did some research regarding religious  
11 exemptions and the rules, the vaccines, their known side effects, and mortality rates.  
12 What I discovered was downright startling, to say the least, so on Monday, October 25<sup>th</sup>,  
13 2021, I informed John Carter by way of Microsoft Teams that intended to opt for a  
14 religious exemption. He never once responded and completely ignored me. (See  
15 submitted screenshot evidence, text sent that morning at 8:57am.)
- 16 9. Later that same day I went to Derek Wissler’s office, asked him to accompany me back  
17 to my office, and I showed him the <https://openvaers.com/covid-data/mortality> website  
18 because I was concerned that he stated during the meeting that previous Friday that the  
19 company had chosen the Pfizer vaccine, which in accordance with the aforementioned  
20 website, had the most fatalities. I thought that was important information and someone  
21 should be made aware of it, which is why I asked him to come to my office in the first  
22 place, yet he just blew off the data as if he didn’t care, shrugged it off as if it meant  
23 nothing and then went back to his office. I also texted the link through MS Teams to John  
24 Carter and Michael Reeves (see submitted screenshot evidence, text sent at 1:57pm); and  
25 once again received no reply whatsoever. In the end, it was not my responsibility to

1 inform their employees of the information I had discovered, so I didn't mention it to  
2 anyone else and just dropped the matter.

3 10. The next day, on Tuesday, October 26<sup>th</sup>, Mitch Lawrence had mentioned checking  
4 shipping to see if there were any boxes which had to be brought up to the IT office and if  
5 so, bring them upstairs. Later that afternoon I had gone down to check, and found there  
6 were numerous very large boxes meant for the IT office. I pushed one to determine its  
7 weight, and it was heavy. When I got back upstairs, I informed Mitch, sending him a text  
8 through MS Teams. (See submitted screenshot evidence, text sent at 1:34pm, and  
9 associated texts thereafter.) I specifically informed him that there was no way I could  
10 take all those boxes upstairs, I also had no medical, so I requested that other  
11 arrangements be made, and even suggested locking them all in a room downstairs instead  
12 of having to drag it all up to the second floor. One minute later, at 1:35pm, he replied,  
13 "Can you work with David Patton to get help carrying them up?" In my mind, that meant  
14 he expected me to call David Patton and ask him to help ME move the boxes up, because  
15 that's exactly what he meant. He did not say, "Can you call David Patton and have him  
16 get some people to carry them up?" I therefore replied accordingly, after which, only then  
17 did he claim he was, "suggesting to work with David to get some other folks to carry  
18 them up."

19 11. The morning of October 28<sup>th</sup>, 2021, while entering my hours in the Robert Half app on  
20 my cell phone, I discovered they were advertising my position. So, later that morning  
21 after I got in, I did a Teams call with John Carter to ask a question about the Dell 8420  
22 series laptops, then said, "So John. I have another question. Is tomorrow my last day?"  
23 He paused for like 5 seconds, then said, "Why, did you speak to Robert Half?" I said no,  
24 and that I found my job being advertised in their app. After that he said I should call  
25 them, which then pretty much confirmed in my mind they were planning on terminating



1 me the next day on Friday. It was specifically because of this discovery that I was able to  
2 make the screenshot evidence. Not long after I then received a call from Abigail Fox  
3 from Robert Half. She apologized profusely and assured me it had nothing to do with job  
4 performance or anything I did wrong, and toward the end of the call I specifically  
5 remember her saying, "Okay well, let's get you back working again," meaning they were  
6 going to find me another assignment, which here in retrospect they never did.

7 12. The next day, on Friday, October 29<sup>th</sup>, 2021, I drove into work, only to find Mitch sitting  
8 in the lobby waiting for me. My badge wouldn't even open the door, so clearly it was  
9 their intention to not even let me work at all that Friday, thereby wasting my time and gas  
10 driving all the way back there for no reason. I had then called Morgan Komatick on my  
11 way back home to tell her that they locked me out, then I mentioned during that  
12 discussion about finding my job being advertised in the app the day before, and she stated  
13 that their (Robert Half's) job advertisements remain up for at least three months. So, I  
14 took that to mean my finding my job being advertised was prophetic, since I actually was  
15 in fact going to be terminated that Friday.

16  
17 In the end, I was terminated from a job that was supposed to be ongoing and permanent, working  
18 for Robert Half for their client, Dormakaba, just days after not only informing them vocally and  
19 in writing that I planned on requesting a religious exemption in lieu of receiving vaccination, but  
20 also just days after requesting accommodations regarding my back problems and the fact that I  
21 have degenerative disc disease. Neither party gave any specific reason for this, Abigail Fox from  
22 Robert Half specifically stated I did nothing wrong and it was not due to my job performance,  
23 and so the obvious reason is because I was being discriminated against. Had I said nothing about  
24 my back and neck problems or just submitted to being vaccinated, I would likely still be working  
25 there today and I fully believe that.




1 It should also be noted that same time period I was working for these companies, in Illinois,  
2 Northshore Health had also terminated any employees who refused vaccination, they did not  
3 provide any religious exemption accommodations, and so their employees filed a lawsuit against  
4 them that same month. Just last week or the week before the date of this statement, it was  
5 determined that Northshore was in violation of Title VII and the employees were awarded \$10.2  
6 million dollars for (1) not providing Constitutionally-protected religious exemptions, and (2) for  
7 blatantly terminating employees who refused to be vaccinated on those grounds.

8 I should hereby then also note Dormakaba's own Position Statement in which they said, "*It*  
9 *(Dormakaba) also communicated that employee could seek exemptions and/or accommodations*  
10 *to the requirement due to a qualified medical reason or sincerely held religious belief by*  
11 *completing an accommodation form and submitting it by November 8, 2021. Dormakaba later*  
12 *informed its vendors, like Robert Half, that no temporary worker, contractor, or vendor would be*  
13 *permitted to work on a Dormakaba work location without attesting to being fully vaccinated*  
14 *against COVID-19 or that they have an approved medical or religious accommodation through*  
15 *their employer.*"

16 Obviously, that is not true because (1) my employment was terminated on Friday, October 29<sup>th</sup>,  
17 2021, exactly one week after the company meeting took place, (2) my employment was  
18 terminated just days after I told Dormakaba employees (John Carter, Michael Reeves, and  
19 Mitchell Lawrence); as well as Morgan Komatick (Robert Half); that I was going to request the  
20 religious exemption, (3) I was never provided with any "exemption form" despite my informing  
21 all of them of that fact, and (4) I was also terminated just days after I requested physical  
22 accommodations. The paragraph above from their Position Statement also indicates that  
23 Dormakaba informed its vendors after November 8<sup>th</sup>, and well, I was terminated ten days before  
24 that date.

1 Dormakaba also claims that Robert Half is responsible for terminating my employment, but I  
2 suspect that is not true. I fully believe that they are both equally liable, since it makes no sense  
3 for any recruiter or staffing agency to terminate their own perfectly good candidate working for  
4 one of their clients, who by the way “did nothing wrong and was **not** terminated because of their  
5 performance,” unless they both agreed to implement such action in unison. It’s abundantly clear  
6 that they just didn’t like the fact that it was my intention to request a religious exemption and  
7 was refusing to be vaccinated, and that I also had back and neck problems along with  
8 degenerative disc disease due to my age, and was therefore too old and unable to move large  
9 oversized heavy boxes up two flights of steps to the IT office, so they retaliated by terminating  
10 my employment. They also lied to their employees by falsely claiming they were “federal  
11 contractors,” and stated that individuals like myself working there through staffing agencies or  
12 recruiting companies were thereby “also required to be vaccinated,” and it’s abundantly clear  
13 that this action was specifically meant to protect their ability to make profits with no concern for  
14 anyone’s Constitutionally-protected religious exemptions or the potential dangers of the  
15 vaccines, and so they lied to everyone to force vaccinations. In closing, it should also be noted  
16 for the purposes of specificity of timeframe how quickly they retaliated by performing the action  
17 of termination. They did so just days after (1) making my disability accommodation request, and  
18 at the same time (2) after informing them it was my intention to avail myself of my  
19 Constitutionally-protected religious exemptions in lieu of being vaccinated, and I have  
20 photographic evidence of these written requests which were submitted to the EEOC, which were  
21 taken the day before they terminated my employment.

22  
23 Dated this 15<sup>th</sup> day of December, 2022

24 By: 

25 PLAINTIFF



## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

William O'Bryant, 448 Walton Avenue, #512,  
Hummelstown, PA 17036

(b) County of Residence of First Listed Plaintiff Dauphin  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

## DEFENDANTS

Dormakaba USA &  
Robert Half International

County of Residence of First Listed Defendant Lancaster  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                                   |   | PTF                        | DEF                                   |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2            | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input checked="" type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

| CONTRACT  | TORTS  | FORFEITURE/PENALTY  | BANKRUPTCY   | OTHER STATUTES  |
|---|--|---|--|---|
| <input type="checkbox"/> 110 Insurance<br><input type="checkbox"/> 120 Marine<br><input type="checkbox"/> 130 Miller Act<br><input type="checkbox"/> 140 Negotiable Instrument<br><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment<br><input type="checkbox"/> 151 Medicare Act<br><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)<br><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits<br><input type="checkbox"/> 160 Stockholders' Suits<br><input type="checkbox"/> 190 Other Contract<br><input type="checkbox"/> 195 Contract Product Liability<br><input type="checkbox"/> 196 Franchise | <b>PERSONAL INJURY</b><br><input type="checkbox"/> 310 Airplane<br><input type="checkbox"/> 315 Airplane Product Liability<br><input type="checkbox"/> 320 Assault, Libel & Slander<br><input type="checkbox"/> 330 Federal Employers' Liability<br><input type="checkbox"/> 340 Marine<br><input type="checkbox"/> 345 Marine Product Liability<br><input type="checkbox"/> 350 Motor Vehicle<br><input type="checkbox"/> 355 Motor Vehicle Product Liability<br><input type="checkbox"/> 360 Other Personal Injury<br><input type="checkbox"/> 362 Personal Injury - Medical Malpractice<br><b>PERSONAL INJURY</b><br><input type="checkbox"/> 365 Personal Injury - Product Liability<br><input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability<br><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability<br><b>PERSONAL PROPERTY</b><br><input type="checkbox"/> 370 Other Fraud<br><input type="checkbox"/> 371 Truth in Lending<br><input type="checkbox"/> 380 Other Personal Property Damage<br><input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881<br><input type="checkbox"/> 690 Other<br><b>LABOR</b><br><input type="checkbox"/> 710 Fair Labor Standards Act<br><input type="checkbox"/> 720 Labor/Management Relations<br><input type="checkbox"/> 740 Railway Labor Act<br><input type="checkbox"/> 751 Family and Medical Leave Act<br><input type="checkbox"/> 790 Other Labor Litigation<br><input type="checkbox"/> 791 Employee Retirement Income Security Act<br><b>IMMIGRATION</b><br><input type="checkbox"/> 462 Naturalization Application<br><input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158<br><input type="checkbox"/> 423 Withdrawal 28 USC 157<br><b>PROPERTY RIGHTS</b><br><input type="checkbox"/> 820 Copyrights<br><input type="checkbox"/> 830 Patent<br><input type="checkbox"/> 835 Patent - Abbreviated New Drug Application<br><input type="checkbox"/> 840 Trademark<br><input type="checkbox"/> 880 Defend Trade Secrets Act of 2016<br><b>SOCIAL SECURITY</b><br><input type="checkbox"/> 861 HIA (1395ff)<br><input type="checkbox"/> 862 Black Lung (923)<br><input type="checkbox"/> 863 DIWC/DIWW (405(g))<br><input type="checkbox"/> 864 SSID Title XVI<br><input type="checkbox"/> 865 RSI (405(g))<br><b>FEDERAL TAX SUITS</b><br><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)<br><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act<br><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))<br><input type="checkbox"/> 400 State Reapportionment<br><input type="checkbox"/> 410 Antitrust<br><input type="checkbox"/> 430 Banks and Banking<br><input type="checkbox"/> 450 Commerce<br><input type="checkbox"/> 460 Deportation<br><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations<br><input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)<br><input type="checkbox"/> 485 Telephone Consumer Protection Act<br><input type="checkbox"/> 490 Cable/Sat TV<br><input type="checkbox"/> 850 Securities/Commodities/Exchange<br><input type="checkbox"/> 890 Other Statutory Actions<br><input type="checkbox"/> 891 Agricultural Acts<br><input type="checkbox"/> 893 Environmental Matters<br><input type="checkbox"/> 895 Freedom of Information Act<br><input type="checkbox"/> 896 Arbitration<br><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision<br><input type="checkbox"/> 950 Constitutionality of State Statutes |
| <b>REAL PROPERTY</b><br><input type="checkbox"/> 210 Land Condemnation<br><input type="checkbox"/> 220 Foreclosure<br><input type="checkbox"/> 230 Rent Lease & Ejectment<br><input type="checkbox"/> 240 Torts to Land<br><input type="checkbox"/> 245 Tort Product Liability<br><input type="checkbox"/> 290 All Other Real Property  | <b>CIVIL RIGHTS</b><br><input type="checkbox"/> 440 Other Civil Rights<br><input type="checkbox"/> 441 Voting<br><input type="checkbox"/> 442 Employment<br><input type="checkbox"/> 443 Housing/Accommodations<br><input checked="" type="checkbox"/> 445 Amer. w/Disabilities - Employment<br><input type="checkbox"/> 446 Amer. w/Disabilities - Other<br><input type="checkbox"/> 448 Education<br><b>PRISONER PETITIONS</b><br><b>Habeas Corpus:</b><br><input type="checkbox"/> 463 Alien Detainee<br><input type="checkbox"/> 510 Motions to Vacate Sentence<br><input type="checkbox"/> 530 General<br><input type="checkbox"/> 535 Death Penalty<br><b>Other:</b><br><input type="checkbox"/> 540 Mandamus & Other<br><input type="checkbox"/> 550 Civil Rights<br><input type="checkbox"/> 555 Prison Condition<br><input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement   |   |  |   |

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act, the Age Discrimination in Employment Act, and Wrongful Termination

Brief description of cause:

Failure of employer to provide accommodations for neck and back injuries sustained in previous auto accidents, failure to provide religious exemptions

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$  
300,000

CHECK YES only if demanded in complaint:  
JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

## FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_